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Attorneys for Defendants
PIONEER CORPORATION, PIONEER NORTH
AMERICA, INC., PIONEER ELECTRONICS (USA)
INC., PIONEER HIGH FIDELITY TAIWAN CO.,
LTD., AND PIONEER DIGITAL DESIGN &
MANUFACTURING COMPANY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: OPTICAL DISK DRIVE
PRODUCTS ANTITRUST LITIGATION**

This Document relates to:

HEWLETT-PACKARD CO.,

Plaintiff,

v.

LG ELECTRONICS, INC., et al.,

Defendants.

MDL Docket No. 3:10-md-02143-RS

Individual Case No. 3:13-cv-05371-RS

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING HEARING
ON MOTION TO DISMISS HP'S
SECOND AMENDED COMPLAINT**

Judge: The Hon. Richard Seeborg
Location: Courtroom 3, 17th Floor

STIPULATION

WHEREAS on June 23, 2014, Plaintiff Hewlett-Packard Company (“HP”) filed a Second Amended Complaint, (ECF No. 36), against the undersigned Defendants (collectively, “Defendants”); and

WHEREAS on August 7, 2014, Defendants filed a joint Motion to Dismiss the Fifth and Sixth Causes of Action of HP’s Second Amended Complaint (“Motion to Dismiss”), (ECF No. 40), and set a hearing on the Motion to Dismiss for September 25, 2014 (“Hearing”); and

WHEREAS on August 28, 2014, the hearing on the motion to dismiss in the companion HP case in this MDL was continued to November 20, 2014; and

WHEREAS Plaintiff and Defendants have conferred and agreed to continue the Hearing to November 20, 2014, to place it on the same calendar as the motion to dismiss in the companion HP case.

NOW, THEREFORE, Plaintiff and Defendants, through their respective counsel, hereby stipulate, agree, and respectfully request that the Court issue an order that:

The Hearing on Defendants’ Motion to Dismiss shall be continued to November 20, 2014, 1:30 pm.

IT IS SO STIPULATED.

Dated: August 28, 2014

JONES DAY

By: /s/ Eric P. Enson
Eric P. Enson

Attorney for Defendants
PIONEER CORPORATION, PIONEER
NORTH AMERICA, INC., PIONEER
ELECTRONICS (USA) INC., PIONEER
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By: /s/ Mark S. Popofsky
Mark S. Popofsky

Attorney for Defendants
HITACHI-LG DATA STORAGE, INC. AND
HITACHI-LG DATA STORAGE KOREA,
INC.

**BARTLIT BECK HERMAN
PALENCHAR AND SCOTT LLP**

By: /s/ Lester C. Houtz
Lester C. Houtz

Attorneys for Plaintiff
HEWLETT-PACKARD CO.

FILER ATTESTATION

Pursuant to Rule 5-1(i)(3) of the Local Rules of Practice in Civil Proceedings Before the United States District Court for the Northern District of California, I, Eric. P. Enson, hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: August 28, 2014

JONES DAY

By: /s/ Eric P. Enson

Eric P. Enson

Attorney for Defendants
PIONEER CORPORATION, PIONEER NORTH
AMERICA, INC., PIONEER ELECTRONICS (USA)
INC., PIONEER HIGH FIDELITY TAIWAN CO.,
LTD., AND PIONEER DIGITAL DESIGN &
MANUFACTURING COMPANY

~~PROPOSED~~ ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: 8/28/14



Honorable Richard Seeborg
United States District Judge